

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Crim. No. 1:18-cr-83 (TSE)

UNOPPOSED MOTION FOR
PROTECTIVE ORDER GOVERNING DISCOVERY

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States of America, by and through Special Counsel Robert S. Mueller, III, hereby moves for entry by this Court of a protective order that will ensure the confidentiality of personal identification information and discovery that are included within the materials to be produced by the government pursuant to its discovery obligations.

Entry of a protective order restricting the use, dissemination, and disposition of such documents is essential to permit the United States to provide discovery to the defendant while protecting, among other things, personal information and other confidential materials. The United States has conferred with counsel for defendant Paul J. Manafort, Jr., and the defendant consents to the proposed Protective Order, a copy of which is submitted with this application.

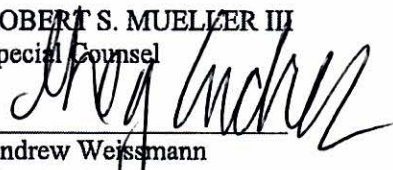
WHEREFORE, the government respectfully moves the Court to enter the proposed Protective Order Governing Discovery.

Respectfully submitted,

ROBERT S. MUELLER III
Special Counsel

Dated: March 26, 2018

By:


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